California School-Based MAA Manual

SECTION 6

MAA Time Survey

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Determining Which Staff Should Time-Survey

To determine which LEA staff might time-survey, two factors must be considered:

- 1. Determine which staff perform MAA, and
- Ensure that appropriate nonfederal funds are expended for MAA in order to receive federal reimbursement.

To determine which staff perform MAA, it is necessary to work with the relevant LEA management and/or administrative staff to discuss both claimable MAA and the various activities performed by staff under the various district or COE programs. It is important to match up the various LEA activities with MAA to ensure that the appropriate staff members are selected. A staff listing or organization chart is helpful to identify LEA functions, staff classifications, and lines of supervision.

Once the potential staff classifications are selected, it is necessary to ensure that sufficient appropriate nonfederal funds are expended to receive federal reimbursement for the costs of the selected staff. Staff positions that are funded 100-percent by federal dollars may not participate in the MAA program, because the Federal Government is already paying its share of costs. Staff may not participate in the MAA program in the proportion of which their positions are federally funded.

Only one survey per individual is allowed, despite different job classifications, if performing MAA for the same district or if their time will be reflected in the same invoice. IF the individual time survey is to be included in 2 or more invoices, copies of the single survey defining time worked for that claiming unit must be clearly indicated and should have an original signature and copies in each audit file.

When staff perform MAA, in any of the four quarters, they must survey to be included in the invoice. If it is initially anticipated that a position will perform MAA, but after three successive time surveys no MAA has been performed, exclude this staff position from the invoice and any subsequent invoices until time can be shown on a survey. If the staff are not going to perform MAA, but they support staff in the survey, then they should be placed in the invoice allocated pool section, which will allow appropriate costs to file into the claim based on a ratio of time survey staff to non- time survey staff.

Time Survey Process

The MAA time survey is the basis of the claim for federal funds, and its completion must be done with strict controls on how it is conducted and how time is recorded.

The time survey is a representative sample of staff's work, which is to be used as the basis of the MAA claim. To claim for an entire year, the LEA must time survey, with the survey time periods randomly selected by DHS. The LEC/LGA shall be notified no later than the 15th day in May annually of the first-quarter time survey period. The DHS-

selected second-, third-, and fourth-quarter survey weeks will be reported to the LEC/LGA within 45 days before the beginning of the new quarter.

The LEA can average the time survey results of any quarter in a fiscal year. Only staff that have completed surveys in 3 quarters may be included in the averaging quarter. The LEA may only average one quarter per year. The averaging quarter cannot be chosen after surveys are completed. Completed surveys must be used for that quarter. If an LEA time surveys for a particular quarter, the LEA cannot choose to use the average for that quarter.

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Averaged Quarter Invoicing Methodology If the LEA chooses to average a quarter, a weighted average will be used to calculate claims for the averaged quarter. The time survey results for all staff in a claiming unit that surveyed three quarters will be averaged by the claiming unit. Those positions that are not time surveyed for three quarters must time survey in the averaged quarter in order to be included in the averaged quarter invoice. The results would be averaged using a weighted average. For instance, a claiming unit consists of five staff. Three staff time surveyed the first 3 quarters, Staff person #4 hasn't time surveyed at all, and Staff person #5 time surveyed the second and third quarter. Staff persons' #4 & #5 must time survey the fourth quarter. Their results would then be averaged into results from the existing average for quarters 1, 2, and 3, using a weighted average. See below for example:

Staff	1	2	3	4	5
Time Survey	1 st , 2 nd , 3 rd qtr	1 st , 2 nd , 3 rd qtr	1 st , 2 nd , 3 rd qtr	Hasn't time surveyed 1 st , 2 nd , or 3 rd quarter	Time surveyed 2 nd and 3 rd quarter
MAA time for one activity	Average 11.2 hours	Average 11.2 hours	Average 11.2 hours	15.5 hours	21 hours
Weighted Average	11.2+11.2+15.5+21 = 70.1; 70.1/5=14.02 hrs for one activity; 14.02 /40 (40 in this example is the average paid hours for included staff)= 35.02%				

This is done for all activities, MAA and non-MAA. The total time on the survey must equal 100%.

Claiming units may begin claiming during any quarter of the fiscal year if they participate in the time survey week. If a claiming unit wishes to begin claiming during the averaged quarter, they must time-survey during the randomly selected fourth-quarter survey week.

The survey is to be completed by all staff that will participate in MAA. In order for staff to be familiar with the various MAA activity codes, training is required prior to surveying. Training should be conducted close to the week prior to the time survey. Once trained,

all staff who time-survey <u>must</u> participate in an annual time survey training. Annual time survey training <u>cannot</u> be claimed during any survey week.

All forms must be completed during the time survey week with either the hard copy or electronic (when available) format chosen for use. Pencil may be used for the survey, with the exception of signatures, which must be ink, specifically not black ink, so original status can be determined. No whiteout can be used: all errors must be thoroughly erased or stricken through, corrected, and initialed. Time recorded must be paid time only, and sufficient backup must be maintained to verify hours paid equals time surveyed. Staff should time-survey daily to ensure accuracy of time recorded.

Time Survey Documentation

Each operational plan participant identified on the Grid shall have time-surveyed each day of the five-day time survey period. When students are not in attendance on the first day of a time survey period, the survey shall begin the sixth day following the return of students and continue for five consecutive days. When the survey period extends into the following quarter, those days shall count within the preceding quarter.

If five consecutive student attendance days cannot be completed before staff are out of session for less than one month, they must time survey five consecutive school days beginning the first day of return.

The time survey activities found in Section 5 require that each participant code only the hours paid according to their contract during the five-day survey week, capturing all activities and using the correct codes. (For example, a participant works a 10-hour day but is only paid for eight hours. The participant should only code 8 hours, starting from when school begins. Worked hours often exceed the paid hours but MAA is reimbursement for paid time only.) Each participant must provide a minimum of two specific samples on the back of the survey of any activities they performed in Codes 4, 6, 8, 10, 12, 14, and 15. The survey will be retained in each claiming unit audit folder.

Local and regional MAA coordinators are responsible for ensuring that staff are completing time surveys during the time survey period. Coordinators must also help staff complete their time survey forms accurately and verify via the sample documentation that staff have completed the forms correctly before placement in the audit file. Audit files are subject to state and federal review.

Time Survey Administration

The responsibility for proper administration of MAA Time Surveys is shared by the individual participant, the participant's supervisor, the LEA MAA Coordinator, the LEC/LGA MAA Coordinator, and DHS.

The time survey process, form, and training summary have been approved by CMS. Significant changes in the MAA program require prior review by CMS.

DHS designates the time survey periods, issues the time survey form and training materials, trains LEC/LGA MAA Coordinators, and reviews time survey forms and the audit file during site visits.

LEC/LGA MAA Coordinators assist DHS by training LEA MAA Coordinators on the MAA program, time survey, and audit file. They provide DHS materials and updates to the local coordinators.

LEA MAA Coordinators are responsible for training all time survey participants, reviewing each time survey form for completion and correctness, ensuring that the surveyed activities are claimable, and maintaining the original time survey forms in the claiming unit audit file. The supervisor of the time survey participant verifies that the number of paid hours recorded are the actual hours paid and that the activities are proper within the job classification. Each time survey participant attends time survey training to learn which MAA activities are within their scope of work and how to properly document their paid time. Each individual is responsible for completing the form as instructed.

Time Survey Review Process

For compliance assurance, DHS requires the three-step process before inclusion in the invoice.

1. Site Supervisors of Time Survey Staff

The first review will be by the Supervisor. He/she will review for the following;

- (1) samples are completed for MAA codes
- (2) hours indicated are the employees paid workday; and
- (3) all totals are accurate and complete.

If the Supervisor finds problems with a survey they must be corrected by the participant and returned to the Supervisor. Once approved by the Supervisor they are forwarded to the LEA MAA Coordinator.

2. LEA MAA Coordinators and Surveying Staff Site Supervisors

The second review is more comprehensive and includes the careful review of samples, training dates, job description and other elements which must align with the Operational Plan (OP). When problems are found which require correction or further training the LEA Coordinator contacts the individual participant. The surveying participant must correct their survey, and/or be provided with additional training as necessary. Only the survey participant can provide corrections in relation to the clarification of sample activities and/or amount of time per code. If the survey cannot be corrected, it will be removed from the sample. Sample activity descriptions must maintain a minimum of 80% accuracy for the unit to meet audit compliance. Time surveys that have not been corrected prior to inclusion into that quarterly invoice must be removed from that quarter invoice.

3. LEC/LGA MAA Coordinators

It is the responsibility of the LEC/LGA Coordinators who signs the invoice and claiming grid to assure the accuracy of the time surveys, and compliance with the school based claiming manual. Each LEC/LGA will conduct reviews of LEA claiming units every 3 years. These reviews should consist of desk and field reviews of all completed time surveys and any training materials used by the LEA. This review function shall be performed by the LEC/LGA, and cannot be subcontracted.

The following must be performed by the LEC/LGA coordinator:

- Attending time survey trainings conducted by or for LEAs.
- Holding LEA Coordinator meetings following time survey periods to enhance LEA Coordinator review of surveys
- Develop, coordinate or provide additional time survey training as necessary before each quarter.
- Identify regional/county time survey questions and seek clarification through the LEC Committee and approval through the DHS.
- Identify random LEAs for Operational Plan review and Audit file compliance.

Role of Vendors

Many LEAs use vendors to help them administer the MAA program. Some parts of the review process/quality control may be contracted out, and other parts cannot be contracted out. In general, LEC/LGA quality control and time survey review must be performed by the LEC/LGA, and cannot be performed by the vendor.

For example:

Vendors supporting either the LEA or LEC/LGA:

- Can conduct training for time survey, operational plan and invoice
- Can prepare LEA invoices for LEC/LGA signature
- Can review time surveys for the LEA
- Cannot perform LEA site reviews at the LEC/LGA level
- Cannot perform LEA time survey reviews at the LEC/LGA level

<u>Ultimate responsibility for all valid claims, deferrals, and disallowances lies with the LEC/LGA.</u>

DHS Claiming Unit Reviews

Quarterly, randomly selected LECs and LGAs will be required to submit 50 time surveys. DHS will perform an initial desk review followed by site reviews as necessary at the LEC/LGA or claiming unit office. Upon conclusion of the review a final written report reflecting positive and negative findings and recommendations for improved performance will be issued in a timely manner to the LEC and LGA Committees. Every LEC/LGA submitting LEA claims will be required to submit at least 50 time surveys annually at designated times chosen by DHS.

Time Survey Review Standards

At each level of review, compliance will include but not be limited to:

- Clean, legible recording of hours or portions of hours for the entire paid workday.
- Correct totaling of MAA and Non-MAA hours.
- Correct sample descriptions for MAA activities. The MAA activity must be referenced in their duty statement.

• Signature and date of participant and supervisor *prior to submission of invoice*.

Field reviews conducted at each level will constitute the additional review of the following:

- Matching the individual's job classification on the time survey to their job classification on the claiming grid.
- Training rosters showing date survey staff was trained.
- Comparison of paid contract hours vs. surveyed hours.
- Review of audit binders as required in the MAA manual.

Non-Compliant Surveys

Time surveys that don't meet the above standards will not be allowed for claiming in that invoice quarter, and cannot be used to average the remaining quarter results.

LEA MAA Time Survey Form

The LEA MAA Time Survey Form has been developed using MS Office/Excel and can be found on the following two pages. The form can be downloaded from the MAA website at www.dhs.ca.gov/maa. Only the DHS-approved survey form can be used. Diskettes with forms can be provided to claiming units so that staff may use the electronic version, print out when completed, signed, and turned in to the appropriate supervisor for signature and maintenance in the local audit file.

Page 1

PROGRAM TIME SURVEY FOR LEA EMPLOYEES PERFORMING MEDI-CAL ADMINSTRATIVE ACTIVITIES For use after 7/1/04

Training Date: Name (Last, First, MI) Job Classification **Employee Number** Claiming Unit (District) School Site Date: Date: Total Record 5 consecutive days Date: Date: Date: - Start with first hour paid - Record the type of activity by code in **15-minute** 2 3 5 2 3 5 7 2 3 5 2 5 2 8 4 8 8 4 8 3 5 increments 1) School-Related, Educational, & other activities 2) Direct Medical Services 3) Non Medi-Cal Outreach 4) Initial Medi-Cal Outreach 5) Facilitating Application for non-Medi-Cal Programs 6) Facilitating Medi-Cal Application 7) Referral, coordination, and monitoring of non-Medi-Cal covered services 8) Ongoing referral, coordination, & monitoring of Medi-Cal covered services 9) Transportation for **non-**Medi-Cal services 10) Transportation-related activities supporting Medi-Cal covered services 11) Non-Medi-Cal translation 12) Translation related to Medi-Cal-covered services 13) Program planning, policy development, & Interagency Coordination relating to non-Medi-Cal services 14) Program planning, policy development, and Interagency Coordination relating to Medi-Cal services 15) Medi-Cal claims administration, coordination. & training 16) General Administration/ Paid Time Off TOTAL HOURS TELEPHONE NUMBER DATE SUPERVISOR SIGNATURE DATE EMPLOYEE SIGNATURE

Instructions: 1. Include 2-3 samples of the activities performed on lines provided below each code. If the same activity is being routinely performed, indicate such.

- 2. Complete the survey on a daily basis for the designated time survey period. Draw a vertical line through columns that represent days that are unpaid (unpaid leave)
- 3. Draw a vertical line through columns that represent days that are unpaid (unpaid leave).
- 4. Record time in 15-minute increments. If using decimals, use .25, .50, .75. If using fractions, use 1/4, 1/2, 3/4
- 5. At the end of the day, total each column in the "Total Hours" column. Each day must equal all hours for which paid that day...
- 6. Be sure to include all training, paperwork, clerical activities, and staff travel required to complete each activity for codes 1–16 during the survey period.
- 7. If hours paid equal more than 8, continue on second survey form.
- 8. Confirm the sum in the bottom right hand corner equals the sum of the bottom row. Sign & date your survey the last day worked & give it to your supervisor. If used two pages, sign the second page also.

The following codes are reimbursable under the Medi-Cal Administrative Activities program. As you record time under each of these specific codes, please include two to three samples of the activity performed on lines provided below each code. To maintain confidentiality, avoid using specific names. Some examples have been included as a reference.
CODE 4. Initial Medi-Cal Outreach: Use this code when initially informing persons about the Medi-Cal program. Examples: informing persons, particularly high risk groups, about Medi-Cal, to determine eligibility; providing referral assistance; participating in or coordinating Medi-Cal trainings/outreach directed toward improving the delivery of Medi-Cal services; and referring students to Medi-Cal-covered services, program screenings, program initiatives, and services; identifying and referring students to Medi-Cal family planning services.
Samples:
CODE 6: Facilitating the Medi-Cal Application: Use this code when assisting an individual in becoming eligible for the Medi-Cal program. Examples: informing individuals of eligibility criteria; helping a family gather information and prepare and package forms; and referring the family to the local eligibility office. Include time performing paperwork, clerical duties, training, and staff travel required to complete these tasks. Use available information to expand enrollment in Medi-Cal.
Samples:
CODE 8: Ongoing Referral, Coordination, and Monitoring of Medi-Cal-covered Services: Use this code for time spent making referrals and coordinating and/or monitoring the delivery of Medi-Cal services. Examples making referrals for medical/mental health Medi-Cal-covered evaluation/screens (but NOT State-mandated exams), and case-managing medical/mental health evaluations and services in the school and community covered by Medi-Cal,
Samples:
Code 10: Transportation Related to Activities in Support of Medi-Cal-covered Services: Use this code for administrative time spent assisting an individual to obtain transportation to a Medi-Cal-covered service. Example: time coordinating and scheduling IEP specialized transportation to Medi-Cal-covered services. This code does not include time spent billing the provider of the transportation or the actual provision of transportation.
Samples:
Code 12: Translation Related to Medi-Cal services: Use this code when arranging for or providing translation services to help individuals access and understand treatment and plans of care covered by Medi-Cal. Translation services must be provided, or arranged with a separate unit or separate employee who specifically performs translation functions for the school, and it must facilitate access to Medi-Cal-covered services.
Samples:
Code 14: Program Planning, Policy Development, and Interagency Coordination related to Medi-Cal Services: Only employees whose job description includes Medi-Cal planning, policy development and interagency coordination should use this code when collaborating with other agencies to evaluate a need for Medi-Cal services; monitoring Med-Cal/mental health delivery in schools; developing Medi-Cal referral resources; or participating in committees to identify, promote, and develop Medi-Cal-covered services within the school system.
Samples:
Code 15: Medi-Cal Administration, Coordination, Claims Administration, and Training: Use this code for any activity directly related to Medi-Cal administration. Examples: time spent by MAA claiming unit coordinators, LEC/LGA coordinators, and time study participants in training/conferences/meetings related to the MAA program; administration, including overseeing, compiling, revising, and submitting claims and operational plans; and coordination.
Samples:
Use additional pages for sample documentation of actual MAA performed as needed.

State of California-Health and Welfare Agency Department of Health Services PROGRAM TIME SURVEY FOR LEA EMPLOYEES PERFORMING MEDI-CAL ADMINSTRATIVE ACTIVITIES For use after 7/1/04 Training Date: Name (Last, First, MI) Job Classification Employee Number Claiming Unit (District) School Site Date: If more than 8 hours per Date: Date: Date: Date: Total day, continue from page 1 in hours 9–16 - Record the type of activity 15 5 15 15 15 10 10 10 in 15-minute increments 1) School/Education activities 2) Direct Medical Services 3) Non Medi-Cal Outreach 4) Initial Medi-Cal Outreach 5) Facilitating Application for non Medi-Cal Programs 6) Facilitating Medi-Cal Applications 7) Referral, coordination, and monitoring of non-Medi-Cal services 8) Ongoing Referral, coordination, and monitoring of Medi-Cal services 9) Transportation for non-Medi-Cal programs 10) Transportation-related activities supporting Medi-Cal services 11) Translation related to non Medi-Cal-covered services 12) Translation related to Medi-Cal-covered services 13) M/C program planning, policy development, and Interagency Coordination related to non M/C services 14) M/C program planning, development, & Coordination related to Medi-Cal services 15) M/C administration, coordination, claims administration, and training

Instructions: 1. Include 2-3 samples of the activities performed on lines provided below each code. If the same activity is being routinely performed, indicate such.

- 2. Complete the survey on a daily basis for the designated time survey period.
- 3. Draw a vertical line through columns that represent days that are unpaid (unpaid leave).
- 4. Record time in 15-minute increments. If using decimals, use .25, .50, .75. If using fractions, use 1/4, 1/2, 3/4

TELEPHONE NUMBER

- 5. At the end of the day, total each column in the "Total Hours" column. Each day must equal all hours for which paid that day...
- 6. Be sure to include all training, paperwork, clerical activities, and staff travel required to complete each activity for codes 1–16 during the survey period.
- 7. If hours paid equal more than 8, continue on second survey form.

16) General Administration/

TOTAL HOURS

EMPLOYEE SIGNATURE

Paid Time Off

8. Confirm the sum in the bottom right hand corner equals the sum of the bottom row. Sign and date your survey the last day worked and give it to your supervisor. If used two pages, sign second page also,

DATE

SUPERVISOR SIGNATURE

DATE

Implications for the MAA Time Survey

Staff who only perform MAA Medi-Cal Coordination, Claims Administration, and Training, and do not claim for any other MAA codes, are **not required** to time-survey.

Staff who perform MAA Medi-Cal Coordination, Claims Administration, and Training and who also perform other MAA **must** time-survey.

Direct Charging in Lieu of Time Survey

Staff who perform MAA Medi-Cal Coordination, Claims Administration, Training and Fiscal Coordination are **not required** to time-survey. However, in order to qualify for direct charge reimbursement, participants must certify 100% of their time spent and be able to provide documentation-supporting this percentage. Documentation should include the method of keeping time records. Ongoing time records or logs would provide a good audit trail and would allow the claiming unit to claim for actual costs, which might vary each quarter. An overhead or indirect rate, established according to OMB A-87 principles, may be applied to personnel expenses. Their duty statements must show that these activities are part of their job.

The MAA OP requires the retention of position descriptions showing that MAA Medi-Cal Coordination, Claims Administration, and Training are part of the job of persons that are direct-charged. LEAs that have "generic" position descriptions for job classifications are required to include duty statements describing the specific MAA-related responsibilities.

Related operating expenses can also be direct-charged. Examples might include travel to MAA-related training, computer equipment or programming expenses, or training materials. Claiming units using service bureaus or consultants to assist in MAA Coordination, Claims Administration, and Training may direct-charge these expenses. These items must be included in the MAA OP. Assigning a MAA account number may be useful in isolating these expenses. Direct-charging some smaller expenses, such as printing time survey forms, may not be worth the effort as all direct-charge expenses must be subtracted from overhead costs.

Clerical staff and supervisors of time survey staff who will be included in the invoice, must either time survey or be included in the allocated cost pool.

Avoiding Duplication of Costs

All costs that will be direct-charged on the MAA Invoice cannot also be included in other sections of a MAA claim.

Examples of Medi-Cal Providers Supporting Schools

These providers are often referred to when performing activities related to MAA Outreach, Referral, Coordination, and Monitoring; Arranging Transportation; and Program Planning, Policy Development, and Interagency Coordination.

Audiologist

Child Health and Disability Prevention Providers (CHDP)

Clinical Laboratories or Laboratories

Perinatal Services Program & Teen Pregnancy Services

County Mental Health/Rehabilitation Services Including Short-Doyle Providers.

Dentists and Dental School Clinics

Dietitians

Dispensing Opticians

Early and Periodic Screening, Diagnosis, and Treatment Providers (EPSDT)

Hearing Aid Dispensers

Home Health Agencies

Hospitals

Incontinence Medical Supply Dealers

Intermediate Care Facilities including Nurse facilities

Local Education Agency School Providers

Medical Specialists

Nurse services including Anesthetists, Midwives Practitioners

Nurses Licensed Visiting/Vocational Nurse (LVN) and Registered Nurse (RN)

Occupational Therapists, including California Children Services (CCS)

Optometrists and Ophthalmologists

Orthodontists

Organized Drug Detoxification Providers

Organized Outpatient Clinic (PH Clinic, Community Clinics)

Personal Care Service Providers

Pharmacies/Pharmacists

Physical Therapists including California Children Services (CCS)

Physicians

Podiatrists

Providers of Medical Transportation

Psychologists

Respiratory Therapists

Regional Center Health Services

Rehabilitation Centers

Renal Dialysis Centers and community Hemodialysis Units

Rural Health Clinics

School Counselors with appropriate credentials/licenses

Social Workers with appropriate credentials/licenses

Short-Doyle Medi-Cal Providers (Mental Health Division)

Skilled Nursing Facilities

Speech-Language Pathologists and Therapists

Supplemental EPSDT Providers (Mental Health)

Trained Health Care Aide Services and Physician Assistants